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5 **UNITED STATES BANKRUPTCY COURT**  
6 **WESTERN DISTRICT OF WASHINGTON**

7 In re: ) Case No. 16-10224 TWD Ch. 13  
8 Dale Ehrenheim and Cheryl Ehrenheim )  
9 Debtor(s) ) RESPONSE TO STATE OF  
10 ) WASHINGTON'S MOTION TO WAIVE  
11 ) STATUTE OF LIMITATIONS AS TO  
12 ) DOMESTIC SUPPORT OBLIGATIONS  
13 )

14 **COMES NOW**, Debtor, by and through counsel, respond to the State of Washington's  
15 (the "State") Motion to Waive the Statute of Limitations as to Domestic Support Obligations, in  
16 support of thereof alleges the following:

- 17 1. The State's motion is not necessary as the limitation period is extended under Code §  
18 108(c) to the later of 1) the expiration of the statute of limitations; or 2) 30 days after  
19 notice is given of the expiration or termination of the automatic stay;  
20 2. The State has not filed a Motion for Relief from Stay to proceed on this debt outside  
21 of the bankruptcy;  
22 3. Thus it appears the State has 30 days to proceed against the Debtor after discharge (an  
23 event that will terminate the automatic stay) even though the statute of limitations  
24 would have expired;  
25 4. While it is true that this debt is not dischargeable per Section 523(a)(5) and  
1328(a)(2) and that the confirmed plan binds all the parties, it does not follow simply  
*a priori* that the statute of limitations is "waived" by the Debtor by filing his  
bankruptcy and confirming a plan. The State seems to think this is so without citing

any authority for this position in their Motion, therefore the motion should be denied or limited to the language from Section 108(c);

**WHEREFORE**, based on the facts above, debtor requests an order denying the State's Motion.

**DATE:** June 23, 2021

Respectfully submitted:

/s/ Mark A. Ditton #45432

Mark A. Ditton, WSBA#45432  
NW Debt Relief Law Firm  
237 NE Chkalov Drive, Suite 111  
Vancouver, WA 98684  
360-831-0893

### **CERTIFICATE OF SERVICE**

The undersigned certifies that a copy of the foregoing was served upon all creditors and interested parties on the attached mailing matrix by sending a true, full and exact copy enclosed in a sealed envelope by regular postage, prepaid, U.S. Mail, or, where specified, electronically:

*Served electronically:*

Office of the U.S. Trustee;  
Jason Wilson-Aguilar; case trustee

Susan M Edison on behalf of Creditor Child Support Department of Social and Health Services  
[BCUEdison@atg.wa.gov](mailto:BCUEdison@atg.wa.gov)

Michael E Siderius on behalf of Creditor Seattle Metropolitan Credit Union  
[michaels@sidlon.com](mailto:michaels@sidlon.com), [meghanh@sidlon.com](mailto:meghanh@sidlon.com)

Dated this 23rd Day of June, 2021.

/s/ Mark A. Ditton #45432

Mark A. Ditton, WSBA #45432  
Attorney for Debtor(s)

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Label Matrix for local noticing  
0981-2  
Case 16-10224-TWD  
Western District of Washington  
Seattle  
Wed Jun 23 14:23:33 PDT 2021

Alaska USA FCU  
PO Box 196613  
Anchorage, AK 99519-6613

Allegro  
851 Treger Ave #200  
San Bruno, CA 94066-3037

Barclays Bank Delaware  
125 S West St  
Wilmington, DE 19801-5014

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P O Box 97050-Dir Of Ln  
Seattle, WA 98124

Cbna  
Po Box 6283  
Sioux Falls, SD 57117-6283

(p)JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

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4590 E Broad St  
Columbus, OH 43213-1301

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Office of the Attorney General  
800 Fifth Avenue #2000  
Seattle, WA 98104-3188

Mark Ditton  
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6920 220th St Sw Ste 300  
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PO Box 196200  
Anchorage, AK 99519-6200

BECU  
PO Box 97050  
Seattle, WA 98124-9750

Bk Of Amer  
4909 Savarese Cir  
Tampa, FL 33634-2413

Cap1/Comp  
Po Box 15524  
Wilmington, DE 19850

(p)CREDIT SERVICE OF CENTRAL WASHINGTON INC  
DBA CENTRAL BONDED COLLECTORS  
PO BOX 1073  
MOSES LAKE WA 98837-0157

Choice Privileges VISA by Barclaycard  
Card Services  
PO Box 8801  
Wilmington, DE 19899-8801

Comenity Bank/Pier 1  
4590 E Broad St  
Columbus, OH 43213-1301

Discover Bank  
Discover Products Inc  
PO Box 3025  
New Albany, OH 43054-3025

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Bankruptcy & Collections  
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Acs/Navient  
501 Bleecker St  
Utica, NY 13501-2401

Alaska Usa Fcu  
4000 Credit Union Dr  
Anchorage, AK 99503-6636

BECU Card Services  
CARD SERVICES  
POB 84707  
Seattle, WA 98124-6007

(p)BANK OF AMERICA  
PO BOX 982238  
EL PASO TX 79998-2238

(p)CAPITAL ONE  
PO BOX 30285  
SALT LAKE CITY UT 84130-0285

Central Col  
408 W 4th Ave Pob 1073  
Moses Lake, WA 98837-0157

Citi AT&T Universal Card  
PO Box 6284  
Sioux Falls, SD 57117-6284

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Kailua, HI 96734-4542

Discover Fin Svcs Llc  
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Wilmington, DE 19850-5316

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Philadelphia, PA 19101-7346

Jonathan Cavens  
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Kent, WA 98030-8521

King County Property Tax  
500 Fourth Avenue Room 600  
Seattle, WA 98104-2387

Kitsap Credit Union  
155 Washington Ave  
Bremerton, WA 98337-5606

Kohls/Capone  
N56 W 17000 Ridgewood Dr  
Menomonee Falls, WI 53051-7096

Lane Bryant Retail/Soa  
450 Winks Ln  
Bensalem, PA 19020-5932

Merchants Credit  
2245 152nd Ne  
Redmond, WA 98052-5519

(p)PERI GARITE  
ATTN CARD WORKS  
101 CROSSWAYS PARK DR W  
WOODBURY NY 11797-2020

PayPal Smart Connect  
PO Box 960080  
Orlando, FL 32896-0080

Quick Collect Inc  
Po Box 4266  
Orchards, WA 98662-0266

Rentoncoll  
Po Box 272  
Renton, WA 98057-0272

SMCU  
P.O. Box 780  
Seattle, WA 98111-0780

Seattle Metropolitan Credit Union  
Accounts Recovery  
1521 1st Ave S #500  
Seattle WA 98134-1473

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Seattle, WA 98101-4065

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Po Box 965007  
Orlando, FL 32896-5007

Syncb/Mervyns  
Po Box 965005  
Orlando, FL 32896-5005

Syncb/Paypal Smart Con  
Po Box 965005  
Orlando, FL 32896-5005

Syncb/Sams Club  
Po Box 965005  
Orlando, FL 32896-5005

Synchrony Bank  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Synchrony Bank  
c/o Recovery Management Systems Corp  
25 SE 2nd Ave Suite 1120  
Miami FL 33131-1605

Target Nb  
Po Box 673  
Minneapolis, MN 55440-0673

Td Rcs/Group Usa Inc  
1000 Macarthur Blvd  
Mahwah, NJ 07430-2035

Tnb - Target  
Po Box 673  
Minneapolis, MN 55440-0673

United States Trustee  
700 Stewart St Ste 5103  
Seattle, WA 98101-4438

Unvl/Citi  
Po Box 6241  
Sioux Falls, SD 57117-6241

Washington State  
Division of Child Support  
P.O. Box 11520  
Tacoma, WA 98411-5520

Wells Fargo Bank N.A., dba Wells Fargo Deale  
PO Box 19657  
Irvine, CA 92623-9657

Wells Fargo Dealer Services  
P.O. Box 17900  
Denver, CO 80217-0900

Wfds  
Po Box 1697  
Winterville, NC 28590-1697

Jason Wilson-Aguilar  
600 University St #1300  
Seattle, WA 98101-4102

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Bk Of Amer Po Box 982238 El Paso, TX 79998	Capital One Bank Usa N 15000 Capital One Dr Richmond, VA 23238	Central Bonded Collectors PO Box 1073 Moses Lake WA 98837
Chase Card Po Box 15298 Wilmington, DE 19850	(d)Chase/Circuitcity Po Box 15298 Wilmington, DE 19850	Nexcard/Mastertrust Po Box 3412 Omaha, NE 68103

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Seattle Metropolitan Credit Union	End of Label Matrix	
	Mailable recipients	60
	Bypassed recipients	1
	Total	61